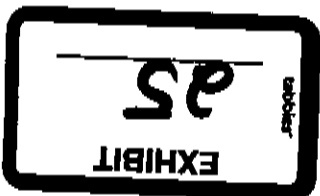


I arrived in the trailer in Mr. Jim Morgan's room at 9:07 a.m. We had so many problems with students on Tuesday, October 14, that I had decided to observe this classroom. I heard laughter coming from Mrs. McCracken's classroom, so I just stood there. She was talking about coming to this country; how she had no family; she had to make it on her own, and what a struggle it's been. She talked about the incident and was joking about it. Statements were made about the police and their handling of the situation. Jokes were made about drinking and the students were laughing. She said, "If I lose my job you know what I can be? I can be a bartender." She stated that the school district was out to get her, that the three principals were conspiring against her and trying to get rid of her. She was alluding to the fact that this may have been part of our plan. I was then handed a note from Jane Gable of something Mrs. McCracken had said earlier -- she was accusing the school board of setting this whole thing up. She was making comments about her personal life and about her daughter. Students sat and constantly laughed. This went on until 9:20 a.m. No Spanish was being taught. At that point I opened the door to the back of the classroom and walked into the room. I noted the look on her face and the students' faces. She looked at me and said, "Yes?" I said I was there to make an informal observation. When I walked in she immediately opened the Spanish book and told the students to open their books. This was at approximately 9:21 - 9:22 a.m. The period started at 8:57 a.m.

October 15, 1997



Wednesday, October 15, 1997

11:20 a.m.

Present: George Deshner, Michael Dolecki, Carl Roznowski,
Claudette DeLeon-McCracken

MR. DOLECKI: We're here because it was recently brought to my attention

that there were concerns about things that were going on in your classroom.

MRS. MCCracken: The kids were asking me questions -- I'm sorry to

interrupt.

MR. DOLECKI: There are concerns about comments you made in your

classroom. I will let Mr. Deshner take over. He is the one who called me this

morning.

MR. DESHNER: I went out to see Mr. Morgan second period. Mr. Morgan

was not there. Mrs. Gable explained to me that Mr. Morgan was in an I.E.P.

While I was standing there, I heard laughing coming from your classroom. That

was at approximately 9:07 a.m. I walked over to the door and heard you

discussing the incident. You came to the United States with no clothes on your

back, you talked about having no family, no brothers or sisters. There were

questions being asked about the incident. There was joking about the incident.

You said people were out to get you. The three principals conspired against you

and were trying to get rid of you. You had that to contend with or you had been

battling -- those might not have been your exact words. You made statements

alluding to the fact that we might be part of this situation. You were laughing

about the police handling this situation, about drinking, about driving and driving.

You said, "Oh well, if I get fired I can always become a bartender." Then everyone laughed. You accused the police of mishandling the situation. You made jokes about that, your personal life, comments were made about your daughter. I don't remember what was said about her. I walked into Mr. Morgan's classroom at about 9:07 a.m. At 9:20 a.m. I walked into your classroom. No Spanish had been taught. This was totally unacceptable. When I walked in you looked surprised and said "Yes?" I said I was there to do an informal observation and I stayed the rest of the period. When I walked in you immediately opened your book and the students opened their books and Spanish was taught until the bell rang. I left and called Mr. Dolecki. I was concerned about what was going on in the classroom involved.

MR. DOLECKI:

Claudette, would you like to comment?

MRS. MCCRACKEN:

I had a problem on Saturday. I wasn't laughing.

Mr. Deshner said that I said I would be a bartender. Mr. Deshner must not have

been listening very well because I said that I would be everything but a bartender. This has been very upsetting. The kids wanted to know. I said I think I should just go home. They said no you shouldn't go home you should stay here and tell what happened. I told them that you cannot break the rules and get away with it. I had an emotional crises -- I was talking to my mother-in-law. My husband left me. I was with friends and I had one drink -- a margarita. I never heard the police follow me -- they surprised me when they punched holes in my tires. I told the police, "I did not hear you follow me. I very seldom drink -- I had one drink --

MRS. MCCracken: They told me who but I won't tell you who they are. The

MR. Dolecki: Who told you --

to school drunk and never get in trouble.

If I get fired, the students said they knew teachers that drink and who come

the police. I am probably in a lot of trouble.

marriage. I was having a drink with friends. I had not eaten all day. I never heard

medication. You can ask my doctor. I am under a lot of stress. This is my third

students pens. Students take them. I am under a lot of stress. I take double

know how to order supplies, talk to Dr. Berkeley. He accused me of giving

I asked for 2 black and 2 red pens and Mr. Deshner said if you want to

Dr. Berkeley I don't even have a class 8th period. I have a study hall.

Dr. Berkeley blamed me -- to allow kids early release 8th period. I told

I have to take two doses of medicine to be able to come to work.

Mrs. Templeton said, "Stop sending kids to the office." I am under a lot of stress.

I have good rapport with the kids. When I had problems with students,

Saegertown before I came to Crawford Central.

car. I had few clothes. I have no family, no brothers, no sisters. I substituted in

have been in this country for 20 years. I had \$1000.00 that I got when I sold my

that? Mr. Deshner, you said you heard me talk about coming to this country. I

late. I told the kids the police did not give me a breathalyzer. How can they do

police." I did not hear them. I saw other drivers, not very many because it was

but due to circumstances involved -- and the students laughed -- I didn't hear the

students said they would testify that there are teachers who come to school drunk every day and do not get in trouble. And I told them that you cannot break the rules and you cannot get away with it. Learn from me. I seldom drink. You can ask Ron Maziarz, the Stanfords and Dan Hootman. I go out with them. I do not have a drinking problem. I told the students I was not drunk. The police didn't give me a breathalyzer test. I'm going to see Mr. Lewis today. The students have a right. I had to give them an explanation.

MR. DOLECKI: I didn't call you here to talk to you about that. What we're

concerned about are your comments in the classroom. There are times -- and

when students ask questions not related to the subject, it's the teacher's

responsibility to get them back on track.

MRS. MCCBRACKEN: I need to give an explanation if they ask for it. They said

are they going to fire you? I said I don't know.

MR. DOLECKI: I repeat, we --

MRS. MCCBRACKEN: Can I interrupt you? The whole school listens to talks here

about drinking and driving. They take away class time don't they?

MR. DOLECKI: Yes.

MRS. MCCBRACKEN: They can also learn from personal experience. Kids have to

learn. They cannot judge me as an alcoholic. I do not have an alcohol problem.

Everyone in the classroom was asking questions. One student brought this in and I

have a couple more that students brought in to me. (Held up article cut out of the

newspaper.)

MR. DOLECKI: Are you receiving any help?

MRS. MCCracken: Medical?

MR. Dolecki: Legal.

MRS. MCCracken: Don Lewis, I'm sorry, Mr. Deshner. I was not joking about

this. I said I would be anything but a bartender. I came to this country with

nothing. Didn't you have ancestors who came to this country with nothing and

survived?

MR. Deshner: Yes.

MRS. MCCracken: I'm struggling. I'm teaching --

MR. Dolecki: Excuse me. What we're going to do --

MRS. MCCracken: Are you going to fire me?

MR. Dolecki: We're not going to fire you. What we're going to do is

suspend you with pay --

MRS. MCCracken: Can I call my doctor?

MR. Dolecki: May I finish? We are going to suspend you with pay for 3

and 1/2 days starting right now through Monday. I have a letter I'll give to you

right now explaining this.

Mr. Simon: She wanted to tell the students --

Mr. Deshner: Did she initiate the conversation?

Mr. Simon: Yes, she wanted to tell us. She started out by telling the students about it. Her story seemed a little far-fetched. She started the conversation at 9:00. She said she was very ashamed and did not want students to hear it from the paper because it would be better that way. No students asked questions. She initiated the entire thing. Said she was out late Saturday evening at a bar. Said she was stressed out because of a lot of stuff going on. She had one margarita and that it was only one. Made mistake of drinking it because she was also on medication. She was driving back about 2 - 2:30. Saw a policeman behind her but there were no sirens or lights. She thought he was chasing someone else when he went around her. She was finally stopped when her tires were blown out. A student asked her how her tires were blown out. She discussed the tool they used. Said policeman said he had been following her for 13 miles and she was evading him. Asked why she didn't hear a siren or no lights. Officer said they had been in pursuit for 13 miles. Police also said she was driving under the influence. Student asked if they gave her a breathalyzer. She said no and didn't ask for one because she thought they would do it. She explained to police that she only had one drink but was also on medication. She said many times that you ask anybody that knows me, they'll tell you I am not a drinker. Only a social drinker. Ask my brother-in-law, he's a cop. After telling her side, she started rambling on about what happened if she got fired. She came to this country with nothing and if she gets fired, she'll know what it's like to have nothing. Started about the administrators and how they were out to get her and have her fired. They have been trying to get me for four years. Then she started making jokes about it. I play favors for you but not for you -- pointing at different students. Explained that if administration wanted her out so bad they will definitely try to fire me. What am I going to do if I lose my job? Oh, I could be a maid or a bartender. Oh, wouldn't that look good. I'll have to sell my car that I have already paid for. Can I come stay with you if I lose my job? I'd be a really good maid. Was jumping around about losing her job and the school. At end she said, I'm the one that doesn't have a drinking problem. There are other teachers at this school that are alcoholics and teachers that come to school drunk and nothing happens to them. At that point, Mr. Deshner walked in. A look of astonishment was on her face. You said, I'm here for an informal observation. She immediately started the lesson and taught to the end of the lesson. She was not her usual self. I was following in the book and students were giving wrong answers. She did not correct them. She made mistakes and students had to correct her.

Katherine Wilkinson: She initiated discussion. Said she didn't give a breath test. She only had one marijuana. Also on medication. She did not hear sirens. She said administration was trying to fire her. She said she was a music teacher. Lived with sister. Taught at Mercyhurst, Maplewood. School board would have an excuse to fire her. Students started working when Mr. Deshner walked in. She said she saw her lawyer yesterday. She mentioned there were a lot of teachers who were alcoholics but never got into trouble. Katherine said she hasn't learned very much this year.

Donna Wilkinson (parent): Class is a joke. Teacher doesn't seem professional. Isn't spending time on subject. Katy doesn't respect her.

Lea Mariani: She sat on desk and began telling her side of the situation. She said the administration was out to get her. School board was meeting tonight. Always been a survivor. She would be a bartender - kidding. She had to work hard, lived with sister, had to work for everything. Students were asking a lot of questions (10 - 15 minutes on this)

Cindy O'Day: She brought it up. She thought administration was trying to fire her. She said she would become a bartender if she lost her job. She talked about her struggle coming to America. Hasn't seen parents in 13 years. She said if she lost her job she wouldn't be able to support her daughter. She was joking and laughing. She spent 10 - 15 minutes on her explanation.

Brent Godfrey: Heard on way to class that she had been arrested for D.U.I. and students were laughing about it. Went on to class and when class started she began discussing the newspaper articles. She started the discussion. Talked all the time until Mr. Deshner walked in and then she started teaching from 9:20 - 9:39. Started out serious but she was joking about it at the end. Said the school board was going to have a special meeting to discuss what happened. Said all three principals hated her and described how she doesn't drink a lot and her friends would know she didn't. Said she knew about other teachers in the school that had alcohol problems but had never been caught. She said other teachers came to school drunk but they never get caught. And she didn't do anything and got arrested. Other students said she mentioned names in other classes. Mr. Hootman was one of the names she gave. Said everyone is trying to get her fired. Oh well, if I get fired, I'll have to get another job and I guess I'll be a bartender. That is when the joking started. She said she didn't know the police were following her for 13-1/2 miles. You smiled and she said to Brent, "Do you think it's funny? I'm going to lose my job?" Students said police had to make so many arrests per day. She said yes they weren't doing their job and made up things about her. Said she would be fired because everyone was out to get her.

Said police didn't give her a breathalyzer and were wrong for what they did.

Said she wished she had never come to this country. It was supposed to be the land of opportunity but was not for her.

Said four times that they popped the tires on her car and she did not have the money to get them fixed. Said if she lost her job she would have to sell her house.

She said she only had one margarita. Kids were holding out their hands saying it was a big one. A lot of joking going on.

Told students she had taught at these other schools before coming here. No one mentioned anything. She initiated the whole discussion. The students were really quiet about it.

Said there was going to be a big fight over this and she would have to fight the police and the school. She had a brother in the State Police and she would call him to take care of this.

NORTH

NEIGHBORHOODS

The Stop Sticks were issued to state

police this year.

Police said charges of driving under

the influence, fleeing an officer, speeding

and other traffic offenses are pending

against Deleon-McCracken.

NORTH HILLS SCHOOLS

Board sets work session tonight

The school board will hold a work ses-

sion at 7:30 this evening in the adminis-

tration center on Sixth Avenue. The

special meeting was called to complete

review of the agenda for the board's Oct.

20 meeting.

FOX CHAPEL

Teacher among 12 finalists

Christine Czapski, a mathematics

teacher at Shady Side Academy, has been

named one of 12 state finalists for the Na-

tional Science Foundation's 1998 Presi-

dential Awards for Excellence in

Mathematics and Science Teaching.

Other winners in Western Pennsylvania

nia were Megan Melucci, a science

teacher at Heritage Elementary School

in Franklin Regional School District; and

Carol Borkovich, a science teacher at

Dickson Intermediate School in the

Woodland Hills School District.

Each statewide award winner will be

considered for the national award, which

is cosponsored by the White House.

MCANDLESS

Rusnak to head special school

Timothy Rusnak has been named

president of Vincentian Academy-Du-

quesne University.

An education professor at Duquesne

University, Rusnak had been special as-

sistant to the dean of Duquesne's school

of education.

Vincentian Academy-Duquesne Uni-

versity is the only university-affiliated

secondary school in the world that has its

curriculum based solely on the interna-

tional baccalaureate. The program offers

students accelerated academic courses

to prepare them for exams that could en-

able them to jump ahead in college, de-

pending on how they score.

CRAWFORD COUNTY

Stop Sticks end chase on I-79

State police had to resort to a new

weapon in their arsenal to stop a woman

who led them on a 13½-mile chase north-

bound along Interstate 79 yesterday.

Claudette Deleon-McCracken, 44, of

Edinboro was stopped when police from

the Meadville barracks laid tire-deflation

devices across the highway at the 161-

mile marker in Vernon, Crawford County.

Called Stop Sticks, each three-sec-

tioned device covers a traffic lane with

hollow tubes intended to puncture tires

and cause a slow leak but no sudden

blowout or accident.

Handwritten: Just under the

9430-14 0097 CPT

IN ORDER FOR A BRAND NAME PRODUCT TO BE DISPENSED, THE PRESCRIBER MUST WRITE "BRAND NECESSARY" OR "BRAND MEDICALLY NECESSARY" IN THE SPACE BELOW.

REFILL _____ TIMES

SUBSTITUTION PERMISSIBLE

DEAN _____

DR. *Handwritten:* J. J. [illegible]

Handwritten: Please excuse
Cigarette from
work due to medical
reasons x 33 day until 1-12-98

Address _____

For *Handwritten:* Cigarette Deleat - Mr. C. [illegible]

John Streiff, MD MD-039312-E
Gretchen Bybel, MD MD-042190-L
Julia Roussos, CRNP MD-057615-L
William Getson, MD

EDINBORO MEDICAL CENTER
Affiliate of Saint Vincent Health System
450 Erie Street
Edinboro, Pennsylvania 16412
814/734-1618



P.D.: I would like to apologize
Mr. Lascola because I wasn't
sure whether I should have

Claudette deLeon-McCracken
pc: Jim Lascola, Superintendent
Claudette deLeon-McCracken

Respectfully yours,

Please submit this request to the Board for its approval at the next Board meeting.

Naturally, I am requesting that the District make normal payments to PSERS for my retirement just as it would were I taking a normal Sabbatical Leave.

I understand that I am not eligible for a true Sabbatical since I will not complete my tenth year of service until after the end of next year. However, I am hopeful that the District will grant this request in light of the fact that I did serve the District as a substitute prior to my normal service. This request is made under Section 1166 of the Pennsylvania School Code which permits granting of leaves for reasons other than those enumerated in the Code.

The purpose of this letter is to request a Sabbatical Leave with half pay for the 1998-1999 work year, as specified in the Collective Bargaining Agreement. The purpose of this leave is for restoration of health.

Dear Mr. Smith:

Mr. Rob Smith, President
Crawford Central School Board
c/o Crawford Central School District
11280 Mercer Pike
Meadville, Pa 16335

March 19, 1998



c/o Mr. Jim Lascola
Superintendent



CRAWFORD CENTRAL SCHOOL DISTRICT

Instructional Support Center

11280 Mercer Pike

Meadville, Pennsylvania 16335-9504

Telephone: (814) 724-3960

FAX: (814) 333-8731

James C. Lascola, Superintendent

OFFICE OF THE SUPERINTENDENT

April 28, 1998

Dear Mrs. de-Leon McCracken:

Claudette de-Leon McCracken
11983 Eureka Road
Edinboro, PA 16412-9626

Your request for a Sabbatical leave for Medical purposes, for the 1998-99 school year was presented to, and approved by, the Crawford Central Board of School Directors at its Regular Meeting of Monday, April 27, 1998. You understand, of course, that this sabbatical carries with it the obligation of returning to your teaching position for the full school term following your leave. Should you not return, you would have the obligation of returning to the Board the salary which you were paid while on leave. Please be advised that this sabbatical leave is granted under the present Pennsylvania School Code, Sections 1166-1171. If the legislature decides to change the sabbatical leave regulations in the future, the School District will review each sabbatical leave request on an individual basis.

We hope that your leave will prove beneficial to restoring you to better health. We will look forward to having you back with us the beginning of the 1999-2000 school year.

Sincerely,

James C. Lascola
James C. Lascola

Superintendent of Schools

JCL/cak

Enclosures

pc: Payroll Department
Personnel File

Mr. George Deshner, Principal

and overly burdensome.

1. Defendants object to Interrogatory No. 1 on the grounds that it is arduous to assume facts not in evidence. The School District had determined to discipline Ms. DeLeon relative to her substandard work performance and her disruptive and unprofessional outbursts, wherein she refused to continue a meeting and indicated that she could no longer continue her teaching duties at that time, *prior* to receiving any information from Dr. Mercatoris, with whom Ms. DeLeon

AND NOW, come Defendants and Response to Plaintiff's Supplemental Interrogatories as follows and with a general objection that these Interrogatories are in excess of what is permitted by the Local Rules, are redundant, vexatious

Response of Defendants to Plaintiff's Second Set of Interrogatories

CLAUDETTE de LEON
)
)
) Plaintiff
)
)
)
) vs.
)
) CRAWFORD CENTRAL SCHOOL DISTRICT
) CRAWFORD CENTRAL SCHOOL BOARD
)
) Defendants
)
) MICHAEL E. DOLECKI, SUPERINTENDENT
)
) Defendant
)
) CHARLES E. HELLER, III, ASSISTANT
) SUPERINTENDENT
)
) Defendant
)

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA



consulted after she walked out the meeting on March 12, 2002. The District did not have permission from Plaintiff to consult with Dr. Mercatoris and therefore exercises the legal right to seek an IME for a full evaluation.

2. Crawford Central School District has no policy mandating suspending teachers with pay for simply requesting a medical leave. However, the circumstances surrounding the suspension of Ms. DeLeon for the timeframe in question are completely unique. Her suspension at that time was not related to her request for medical leave, but rather the unprofessional behavior exhibited prior to said request.

3. Defendants object to Interrogatory No. 3 because this topic was discussed in depth at depositions and has been addressed at length by testimony under oath. Thus, further inquiry is unduly burdensome.

4. Defendants object to Interrogatory No. 4 as this topic was discussed in depth at depositions and has been addressed at length by testimony under oath. Thus, further inquiry is unduly burdensome. By way of further answer, and not derogation of the foregoing, the Defendants deny that Ms. DeLeon's resignation was requested. As explained during depositions, Plaintiff's potential resignation with pay through the end of the 2001-2002 school year, was provided as an option to Ms. DeLeon should she choose to accept it, given her unprofessional behavior and contention she could not continue teaching.

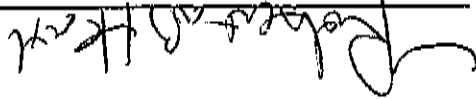
5. Defendants object to Interrogatory No. 5 as it assumes facts not in evidence. By way of further answer, Dr. McFadden's release speaks for itself and indicates that she was fit to return to full duty without restrictions essentially

Attorneys for Crawford Central School
District, Crawford Central School Board,
Michael E. Dolecki, Superintendent and
Charles E. Heller, III, Assistant
Superintendent, Defendants

Phone: 814-943-3304
Fax: 814-943-0856

3366 Lynnwood Drive
P.O. Box 1311
Allioma, PA 16603

Roberta Binder Heath, Esquire
Pa. Id. No. 50798
[rbheath@andrewsbeard.com]



ANDREWS & BEARD

Respectfully submitted,

by releasing her to return to work as a teacher. No restrictions are indicated
whatsoever. Consequently, there was no need to consult with Dr. McFadden
about restrictions that were not applicable or necessary.

6. Defendants object to Interrogatory No. 6 because this topic was the
subject of discussion at deposition and testimony was provided at length and
under oath concerning this issue. Thus, any further inquiry is unduly
burdensome.

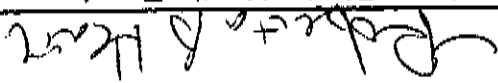
CERTIFICATE OF SERVICE

The undersigned attorney does hereby certify that a true and correct copy of Defendant's First Set of Interrogatories Directed to Plaintiff was served on the following counsel of record by U.S. Mail, postage prepaid on this 24th day of May 2006:

Caleb L. Nichols, Esquire
P.O. Box 1585
Erie, PA 16507

Respectfully submitted,

ANDREWS & BEARD



Roberta Binder Heath, Esquire
Pa. Id. No. 50798
[rbheath@andrewsbeard.com]

3366 Lynnwood Drive
P.O. Box 1311
Altoona, PA 16603

Phone: 814-943-3304
Fax: 814-943-0856

Attorneys for Crawford Central School
District, Crawford Central School Board,
Michael E. Dolacki, Superintendent and
Charles E. Heller, III, Assistant
Superintendent, Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CLAUDETTE de LEON

Plaintiff

vs.

(NO. 05-126E)

CRAWFORD CENTRAL SCHOOL DISTRICT
CRAWFORD CENTRAL SCHOOL BOARD

Defendants

MICHAEL E. DOLECKI, SUPERINTENDENT

Defendant

CHARLES E. HELLER, III, ASSISTANT
SUPERINTENDENT

Defendant

Response of Defendants to Supplemental Interrogatories¹

AND NOW, come Defendants and Response to Plaintiff's Supplemental interrogatories as follows and with a general objection that these interrogatories are in excess of what is permitted by the Local Rules, are redundant, vexatious and overly burdensome.

7. Defendants object to Interrogatory No. 7 on the grounds that it is vague, ambiguous and misleading. By way of further answer, and not in derogation of the foregoing, in accordance with the law, School Districts typically maintain separate investigative files relative to particular disciplinary procedures. In addition, administrators often keep their own files relative School District personnel. There is no obligation of notifying the Plaintiff any separate file was kept. Plaintiff's office personnel

¹ Numbers one (1) through six (6) are not Interrogatories. The actual Interrogatories start at Number 7.

10. No other teacher presented similar concerns, such as displaying inappropriate emotional outbursts, being unable to complete meetings with administrators, or claiming she could no longer continue teaching, and could "not go on". Further, approximately ten (10) years ago, the District instituted an Employee Assistance Program, whereby employees can seek assistance in arranging and obtaining counseling and medical

as directed.

9. The School District purged Plaintiff's personnel file relative to the negative evaluation for the 1995/1996 performance evaluation she received. As specified in response No. 8, at this point, it is difficult to determine who complied with Arbitrator Talanco's directive over ten (10) years ago. Nonetheless, the personnel file was purged

directive.

8. The School District did purge Plaintiff's personnel file as directed. See also, response to No. 7 above. However, at this point, twelve (12) years later, it is difficult to specify the precise method of how and who complied with Arbitrator Stottenberg's

Thus, the District by purging the personnel file complied with the arbitrator's directive.

file was purged in accordance with the arbitrator's directive so that any negative information contained therein would not be utilized to establish progressive discipline for subsequent proceedings. The arbitrator's decision in this regard does not mandate that all records must be destroyed, but simply that the personnel file be purged so that the negative information cannot be utilized as a basis for disciplinary actions in the future.

13. The Defendants object to Interrogatory No. 13 as a mischaracterization of the information that has been provided in the discovery process to date. Plaintiff was not suspended for submitting a medical excuse, but rather because of her behavior at the

demand for a resignation.

12. The Defendants object to this Interrogatory as it assumes facts not in evidence. As specified by both Mr. Heller and Mr. Dolecki at their depositions, Ms. DeLeon's resignation was not requested upon the submission of a medical excuse. Essentially, because of Ms. DeLeon's unprofessional performance and bizarre outburst at the meeting in March of 2002, in which she indicated that "she could not go on" and could no longer teach," resignation was broached as an option wherein Plaintiff could choose full pay until the end of the school year. This option was offered to Plaintiff as a potential solution to her assertion she could not longer teach. This option was not a request or a

teacher, including the Plaintiff, to resign due to a psychiatric disability.

11. Defendants object to Interrogatory No. 11 on the grounds that it seeks evidence not reasonable calculated to lead to the discovery of relevant evidence. By way of further answer, and not in derogation of the foregoing, Defendant never requested any

information that is relevant to this case.

and for other problem areas. Participation in the program is highly confidential and this assistance for drug and alcohol problems, marriage counseling, financial counseling,

required by law.

employee. Consequently, union representation as a matter of due process is not typically not meetings that would have the potential for resulting in the discipline of an of further answer, and not in derogation of the foregoing, Parent-teacher conferences as information reasonably calculated to lead to the discovery of relevant evidence. By way inflammatory language to mischaracterize facts in evidence and because it fails to seek 15. Defendants object to interrogatory No. 15 on the grounds that it uses

Plaintiff.

evaluations were provided because of unacceptable work performance on the part of the explained at the depositions by various administrators. Essentially, the unsatisfactory reasons underlying the merits and timing of the evaluations in question were fully position concerning the unsatisfactory evaluations. This reliance is misplaced. The proceedings to establish evidence on a variety of issues, such as the School District's depositions taken in this case. Plaintiff, at this point, is relying on the arbitration 2001/2002 and the 2003/2004 evaluations have been addressed at length at the inflammatory language to mischaracterize facts in evidence. The details concerning the 14. Defendants object to interrogatory No. 14 on the grounds that it attempts to use

depositions of various administrators.

March 12, 2002 meeting, which has been testified to at length, under oath at the

20. The Defendants object to Interrogatory No. 20 on the grounds that it is vague, overly broad and unduly burdensome particularly because it does not specify any timeframes as to other teachers being put on an action plan. Mr. Higgins indicated that since his starting as an assistant principal with the District, three (3) other teachers that were male were placed on action plans. These individuals were Caucasian. In other years, four (4) Caucasian male principals were put in action plans. Three (3) other Caucasian female teachers were placed on action plans.

19. This information was discussed at length in the depositions of the administrators. Consequently, any further questioning is redundant and may be deemed harassment on the part of the Plaintiff as these matters were fully discussed at deposition.

18. This information was discussed at length in the depositions of the administrators. Consequently, any further questioning is redundant and may be deemed harassment on the part of the Plaintiff as these matters were fully discussed at deposition.

17. This information was discussed at length in the depositions of the administrators. Consequently, any further questioning is redundant and may be deemed harassment on the part of the Plaintiff as these matters were fully discussed at deposition.

16. This information was discussed at length in the depositions of the administrators. Consequently, any further questioning is redundant and may be deemed harassment on the part of the Plaintiff as these matters were fully discussed at depositions.

24. The Defendants object to Interrogatory No. 24 on the grounds that it assumes facts not in evidence relative to disabled students not being reasonably and adequately accommodated. As touched upon at depositions, the School District was very well

or perceived disability.

23. Defendants object to Interrogatory No. 23 on the grounds that it is vague so as to be unintelligible. By way of further answer, and not in derogations of the foregoing objection, this information was addressed at length in the documents that were provided to the Plaintiff and also through the depositions of the school administrators. Nonetheless, it precisely because Plaintiff failed to meet the criteria set forth in the action plan that she was terminated, which details have been explained and constitute legitimate business reasons in no way associated with Plaintiff's national origin, gender

22. Yes. This information is contained in all the documents that have been provided and has been addressed at length in the depositions of District administrators.

21. Defendants object to Interrogatory No. 21 on the grounds that it is vague and ambiguous so as to render the question unintelligible. By way of further answer and not in derogation of foregoing, some discussion occurred between the Union and the District concerning an ESL position as an option prior to Plaintiff's last unsatisfactory evaluation and ultimate termination. Also, a difference exists between bidding into a position and "applying" for a position as defined and dictated by the Collective Bargaining Agreement.

27. Defendant objects to Interrogatory No. 27 on the grounds that it is vague, ambiguous, and assumes facts not in evidence. By way of further answer, and not in derogation of the foregoing, the District has all of these policies and administrators have been and continue to be trained on these policies and underlying procedures. Finally, no teacher, including Plaintiff, has ever made and internal complaint relative to any claim for harassment of any kind.

26. This information was already addressed in deposition that not all teachers are required to maintain student discipline logs, but many teachers do as a matter of course and prudent professional conduct. Plaintiff was subject to an action plan, which is a wholly different matter than the general policy. Plaintiff specifically was subject to an action plan due to her substandard performance, in part relating to continuing disciplinary problems.

specifically by administrators during their depositions.

25. Defendants object to Interrogatory No. 25 on the grounds that it is so vague so as to be essentially unintelligible. By way of further answer, and not in derogation of the foregoing, the procedure relative to investigating student violations was addressed

accommodated in accordance with the law.

the individual education plans (IEP's) pursuant to the IDEA and students were aware of its responsibilities to students primarily under the IDEA, the Rehabilitation Act, and the ADA. In this regard, student accommodation plans and methods are specified in

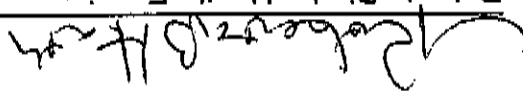
CERTIFICATE OF SERVICE

The undersigned attorney does hereby certify that a true and correct copy of Defendant's First Set of Interrogatories Directed to Plaintiff was served on the following counsel of record by U.S. Mail, postage prepaid on this 24 day of May 2006:

Caleb L. Nichols, Esquire
P.O. Box 1585
Erie, PA 16507

Respectfully submitted,

ANDREWS & BEARD



Roberta Binder Heath, Esquire
Pa. Id. No. 50798
[rbheath@andrewsbeard.com]

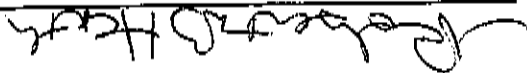
3366 Lynnwood Drive
P.O. Box 1311
Altoona, PA 16603

Phone: 814-943-3304
Fax: 814-943-0856

Attorneys for Crawford Central School District,
Crawford Central School Board, Michael E.
Dolecki, Superintendent and Charles E. Heller,
III, Assistant Superintendent, Defendants

Respectfully submitted,

ANDREWS & BEARD



Roberta Binder Heath, Esquire

Pa. Id. No. 50798

[rbheath@andrewsbeard.com]

3366 Lynnwood Drive

P.O. Box 1311

Alltona, PA 16603

Phone: 814-943-3304
Fax: 814-943-0856

Attorneys for Crawford Central School District,
Crawford Central School Board, Michael E.
Dolecki, Superintendent and Charles E. Heller,
III, Assistant Superintendent, Defendants

Any reproduction of this transcript
is prohibited without authorization
by the certifying agency.

March 6, 2006

CARL ROZNOWSKI

DEPOSITION OF

* * * * *

Defendant

ASSISTANT SUPERINTENDENT,

CHARLES E. HELLER, III,

Defendant,

SUPERINTENDENT,

MICHAEL E. DOLECKI,

Defendants,

CENTRAL SCHOOL BOARD,

DISTRICT, CRAWFORD

CRAWFORD CENTRAL SCHOOL * 05-126E

vs. Case No:

Plaintiff,

CLAUDETTE DELON,

* * * * *

WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES DISTRICT COURT



1	DEPOSITION	1
2	OF	2
3	CARL ROZNOWSKI, taken on behalf of the	3
4	Defendants herein, pursuant to the	4
5	Rules of Civil Procedure, taken before	5
6	me, the undersigned, Wendy Blair, a	6
7	Court Reporter and Commissioner of	7
8	Deeds in and for the Commonwealth of	8
9	Pennsylvania, at the administrative	9
10	offices of Crawford Central School	10
11	District, 11280 Mercer Pike, Meadville,	11
12	Pennsylvania, on Monday, March 6, 2006,	12
13	beginning at 2:30 p.m.	13
14		14
15		15
16		16
17		17
18		18
19		19
20		20
21		21
22		22
23		23
24		24
25		25
1	INDEX	1
2		2
3	WITNESS: CARL ROZNOWSKI	3
4	EXAMINATION	4
5	By Attorney Heath	5
6	EXAMINATION	6
7	By Attorney Nichols	7
8	RE-EXAMINATION	8
9	By Attorney Heath	9
10	CERTIFICATE	10
11		11
12		12
13		13
14		14
15		15
16		16
17		17
18		18
19		19
20		20
21		21
22		22
23		23
24		24
25		25

1	APPENDICES	1
2		2
3	CALEB L. NICHOLS, ESQUIRE	3
4	P.O. Box 1585	4
5	Erie, PA 16507	5
6	COUNSEL FOR PLAINTIFF	6
7		7
8	ROBERTA BINDER HEATH, ESQUIRE	8
9	Andrews and Beard	9
10	3366 Lynnwood Drive	10
11	P.O. Box 1311	11
12	Altona, PA 16603-1311	12
13	COUNSEL FOR DEFENDANTS	13
14		14
15	RICHARD S. MCEWEN, ESQUIRE	15
16	Pennsylvania State Education	16
17	Association	17
18	4250 Rt. 6N	18
19	Edinboro, PA 16412	19
20	COUNSEL FOR CARL ROZNOWSKI	20
21		21
22	ALSO PRESENT:	22
23	MICHAEL E. DOLECKI	23
24		24
25		25
1	EXHIBIT PAGE	1
2		2
3	PAGE	3
4	NUMBER DESCRIPTION IDENTIFIED	4
5	One Mr. Mehek's Notes	5
6	Two Mr. Roznowski's Notes	6
7	Three Ms. Willison's Notes	7
8	Four 3/18/03 Letter	8
9		9
10		10
11		11
12		12
13		13
14		14
15		15
16		16
17		17
18		18
19		19
20		20
21		21
22		22
23		23
24		24
25		25

<p>Page 9</p> <p>1 If I ask you a question that you 2 don't understand, please let me know 3 and I'll be happy to repeat or rephrase 4 the question for you. If you do 5 understand the question, then I expect 6 you to answer that question truthfully. 7 A truthful answer may very well be I 8 don't recall. 9 If, in fact, there are notes or 10 some other documentation that you can 11 refer to refresh your recollection, let 12 me know. I know you brought a copy of 13 notes with you today. This is the 14 first time that I've seen these notes, 15 and I will tell you that I have not 16 looked at them in detail. But if when 17 I'm asking you general questions, if 18 you'd like to refer to these notes, let 19 me know and I'll be happy to let you 20 look at them. I will be attaching them 21 to your transcript as well. 22 Also, I would ask that you keep 23 your responses verbal, as the Court 24 Reporter cannot take down any gestures 25 or any vague responses such as uh-uh or</p>	<p>Page 7</p> <p>1 PROCEEDINGS 2 3 CARL ROZNOWSKI, HAVING FIRST BEEN DULY 4 SWORN, TESTIFIED AS FOLLOWS: 5 6 EXAMINATION 7 BY ATTORNEY HEATH: 8 Q Mr. Roznowski, am I saying that 9 correctly? 10 A That is correct. 11 Q Okay. My name's Robin Binder 12 Heath, and I have been retained to 13 represent the School District and Mr. 14 Dolocki and Mr. Heller in a lawsuit 15 that has been brought in the Federal 16 Court by Ms. delcon in which she is 17 alleging various legal violations 18 concerning her civil rights, and has 19 sued the District and Mr. Dolocki and 20 Mr. Heller individually as well as 21 their professional capacities relative 22 to her employment with the District and 23 her ultimate termination in April of 24 2003. 25 The reason that I subpoenaed you</p>
<p>Page 8</p> <p>1 today is to try to get your 2 recollection of some of the facts about 3 what you are aware concerning some of 4 the issues the administration had on an 5 ongoing basis concerning Ms. delcon's 6 performance and what you may or may not 7 know about that. 8 First, I'm going to ask you some 9 general background questions, and then 10 we'll get to the specifics. And I'll 11 try to be as brief as possible. 12 A Okay. 13 Q Also, you have Counsel here 14 representing your interests, so that if 15 you want to take a break at any time to 16 speak with Counsel for any reason, you 17 may do so. I would ask that you keep 18 all your responses verbal so the Court 19 Reporter can take them down. I will 20 remind you that you are under oath, and 21 even though this is an informal 22 setting, a Court Reporter is taking 23 down anything that anyone in this room 24 says so that a formal record will be 25 made.</p>	<p>Page 6</p> <p>1 OBJECTION PAGE 2 3 ATTORNEY 4 Heath 5 69, 70, 70, 72, 6 73, 75, 76, 79 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

<p>Page 13</p> <p>1 Q Currently, what union positions do you hold?</p> <p>2 I am the co-grievance chairperson dealing with secondary. I</p> <p>3 am also the computer resource person.</p> <p>4 Q Now, is that a union position, or is that a supplemental position?</p> <p>5 A Well, it's part of our budget.</p> <p>6 I deal with the seniority of the 10 District.</p> <p>11 Q What does that mean?</p> <p>12 A We make sure that both the 13 District and the union agree on the 14 same starting date of all the employees 15 so that if there's any furlough in the 16 future that the correct individual is 17 furloughed.</p> <p>18 Q And how long have you held that 19 position?</p> <p>20 A That would be --- boy, that's a 21 long one, probably the middle '90s.</p> <p>22 Q And when did you become 23 co-grievance chairperson?</p> <p>24 A Let's see. I believe that would 25 have been probably either 2002 or 2003</p>	<p>Page 11</p> <p>1 Q Did you work for the District 2 prior to going to Meadville Senior High 3 School?</p> <p>4 A Yes, I started with the District 5 in 1978.</p> <p>6 Q And what do you teach?</p> <p>7 A At the present time, I'm 8 teaching academic chemistry and 9 practical chemistry.</p> <p>10 Q In 1978, what were you teaching?</p> <p>11 A At that time I was teaching 12 academic chemistry and general science, 13 or it was called junior science.</p> <p>14 Q And where was that? Where did 15 you teach?</p> <p>16 A That was also at the high 17 school.</p> <p>18 Q So throughout the time frame 19 that you worked for the District, did 20 you always work at the high school 21 level?</p> <p>22 A No.</p> <p>23 Q And when did you not work at the 24 high school level?</p> <p>25 A The following year, 1979, I</p>
<p>Page 12</p> <p>1 worked at the junior high, in which I 2 taught ninth grade physical science for 3 a number of years until I made that 4 switch to the high school.</p> <p>5 Q Which was a couple of years 6 before the addition, which you don't 7 know when that was?</p> <p>8 A I don't recall.</p> <p>9 Q Can you give me a decade?</p> <p>10 A Oh, it would have been in the 11 '90s, late '90s.</p> <p>12 Q And prior to being employed with 13 the Crawford Central School District, 14 did you work for any other school 15 district?</p> <p>16 A No, I did not. I came upon this 17 District directly from college.</p> <p>18 Q Where did you go to college?</p> <p>19 A Indiana University of PA.</p> <p>20 Q When did you graduate?</p> <p>21 A 1978.</p> <p>22 Q And what was your major?</p> <p>23 A Chemistry and education.</p> <p>24 Q What's your certification in?</p> <p>25 A Chemistry.</p>	<p>Page 10</p> <p>1 uh-huh. So I would ask you to say yes 2 or no.</p> <p>3 A Yes.</p> <p>4 Q Or no shrugging of your 5 shoulders or nodding of your head or 6 anything of that nature. Also, please 7 wait until I finish my question prior 8 to your answering my question so that 9 there's not two people talking at once 10 and we can keep the record clear, okay?</p> <p>11 A Okay.</p> <p>12 Q Okay. You're currently employed 13 with the Crawford Central School 14 District, correct?</p> <p>15 A That is correct.</p> <p>16 Q And what building do you work 17 in?</p> <p>18 A Meadville Senior High.</p> <p>19 Q And how long have you been 20 working in the high school, Meadville 21 High School?</p> <p>22 A That I don't recall. I'm going 23 to say it was a couple years before the 24 addition, and that I don't remember 25 when the new addition was put on.</p>

<p>1 the principal if he could send down a 2 janitor to open up the file cabinet, 3 which he did, which it was not in 4 there. Then at that time, I was 5 probably in a panic because I did not 6 know where they were located at. 7 So I did give a call to PSBA to 8 see if they had it, and in talking with 9 their secretary, they were indicating 10 they didn't have it. And I contacted 11 Kristin Hope, who's the co-chairperson, 12 and she looked through some other 13 materials that were given back to her, 14 and it was in a box, and then I found 15 my notebook. And I just got it back 16 probably last Thursday. 17 Q And with regard to when you were 18 a building representative, would you 19 keep similar notes on every individual 20 that you attended meetings for? 21 A Yes. 22 Q And these were never given to 23 PSBA; is that correct? 24 A Those were given, but they were 25 returned to us. And the date at which</p>	<p>1 April of 2003, what were you, or you 2 don't remember? 3 A That I don't remember. I 4 couldn't tell you. 5 Q Sitting at her meetings, though, 6 you would have probably been a building 7 representative; is that correct? 8 A Yes, that would have been 9 correct. 10 Q Have you held any other union 11 positions? 12 A Yes. I was the vice president 13 and president. 14 Q When were you vice president? 15 A I'm going to say early '80s. 16 Q And when were you president? 17 A It would be the following year. 18 Q So sometime in the early '80s? 19 A Yes. 20 Q Any other positions or any other 21 times? 22 A No. 23 Q Now, coming here today, as I 24 indicated, you provided me with some 25 records. Before the deposition today,</p>
<p>1 did you look at the PSBA file on 2 Claudette deLeon? 3 A I looked at my notes, which are 4 there next to you. 5 Q Now, when you're saying your 6 notes, this is what you brought with 7 you today? 8 A Yes. 9 Q Is that correct? Where did you 10 have these notes? 11 A Those notes were in a blue 12 binder, which was with Kristin Hope, 13 who was the co-grievance chairperson 14 elementary, which was in a box that was 15 given back to her by Jeff Lewis. 16 Q And who's Jeff Lewis? 17 A He is our field representative 18 for PSBA. 19 Q And how did you find them? 20 A When I was looking for my notes, 21 I could not find them where they 22 normally should have been. So I 23 thought they were in one file cabinet, 24 which was at school, which was locked, 25 which the key was lost. And I asked</p>	<p>1 at the time. There was another 2 individual in front of me that was a 3 grievance chairperson, so I can't 4 remember when he --- 5 Q And who was that? 6 A Allen Hille (phonetic). 7 Q Prior to being the co-grievance 8 chairperson, were you a building rep? 9 A Yes. 10 Q How long were you a building 11 rep? 12 A Boy, this is taking me back. I 13 do remember I've been a building rep 14 for the high school probably four, five 15 years, and a building rep for the 16 junior high probably 10 or 12 years. 17 The exact time dates I couldn't tell 18 you. 19 Q So that the high school would 20 have been around 2001, 2000? 21 A I would say probably late '90s 22 to the time at which I became a 23 co-grievance chairperson. 24 Q Okay. So at the time that 25 Claudette deLeon was terminated in</p>

<p>Page 19</p> <p>1 absolutely sure because he did sit in 2 on some of the meetings, is Doug Melhok 3 (phonetic). 4 Okay. 5 ATTORNEY HEATH: 6 Just because I don't want 7 to lose these, I am going to 8 identify them as Exhibit One, 9 and just with the notation that 10 these are probably Mr. Melhok's 11 notes, but I'll attach them to 12 your deposition, just so I don't 13 lose them. 14 (Roznowski Exhibit Number 15 One marked for 16 identification.) 17 A Sure. If I may have some water? 18 ATTORNEY HEATH: 19 Sure. 20 BY ATTORNEY HEATH: 21 Q The notes that you gave me 22 today, and as I said, I admit that I 23 have not looked at them in any great 24 detail, but it looks like they start 25 --- well, it does say last day of</p>	<p>Page 20</p> <p>1 they were returned, I do not know. 2 Q But that would have been 3 sometime around the arbitrations 4 concerning her termination? I know you 5 testified --- 6 A I'm saying --- 7 Q --- at the arbitrations? 8 A Yes. I'm thinking probably at 9 that time, some later date on which 10 they were given to Kristen Hope. 11 Q Okay. Let me ask you before I 12 mark this as an exhibit. Are these 13 your notes, these two pages? It 14 doesn't necessarily look like your 15 writing, but I can't really tell. 16 A No. They're not my handwriting. 17 No. 18 Q Do you have any idea whose 19 writing they are? And I will just tell 20 you, I got them from the PSA file 21 along with notes that I'll show you in 22 a little bit that are Joann Willison's 23 notes. 24 A Yes. The only person that I may 25 think that this may be, and I'm not</p>
<p>Page 21</p> <p>1 involved with Claudette deLeon, do you 2 remember? 3 A I would think at that time, at 4 the earliest time, I was probably a 5 floating rep, and if I remember, Dan 6 was at the meeting and Pat was at the 7 meeting. That was a time in which Pat 8 was --- she gave up being president of 9 the Association. I think Dan was 10 becoming president. I'm not sure. I 11 could be off by a year. And I moved 12 from the junior high to the senior 13 high, so they probably got my 14 involvement at the time. 15 Q And you think that was somewhere 16 around that late '90s, that you thought 17 that that was when you moved up; 18 correct? 19 A Uh-huh (yes). 20 Q Now, prior to coming here today, 21 did you review these notes that you 22 provided to me? 23 A Yes, I did look over them. 24 Q And did that help refresh your 25 recollection as to some of the issues</p>	<p>Page 18</p> <p>1 school at the top of one page, but then 2 it says April 14th of 2001. And it 3 might be because it's a continuation 4 from the second to last page, which is 5 June 7th, 2002, so it probably goes 6 there. But the way that the notes were 7 presented to me was the last pages of 8 these notes would be the first in time? 9 A Uh-huh (yes). 10 Q And then the first page is the 11 last in time, which is April 10th of 12 2003. My question to you is as a 13 building representative prior to April 14 14th of 2001, were you ever involved in 15 any meetings concerning Claudette 16 deLeon? 17 A No. 18 Q Was the first involvement you 19 had with the start of these notes? 20 A Yes. 21 Q And these notes were not purged 22 in any way, thrown out, prior years, or 23 anything of that nature? 24 A No. 25 Q And how was it that you became</p>

<p>1 Q Were you aware that Ms. deLeon 2 was subject to a corrective action plan 3 for the 2002 --- actually 2001/2002 4 school year? Were you aware of that? 5 A Yes. 6 Q And were you aware that then 7 there was another corrective action 8 plan that was implemented with the 9 2002/2003 school year? 10 A Yes. 11 Q That plan then was subsequently 12 revised, were you aware of that? 13 A Yes. 14 Q Did you ever see any of the 15 action plans, review them, while you 16 were acting in the capacity of a 17 building representative? 18 A I believe in my folder I may 19 have a copy of that action plan. I 20 can't say for sure, but I think I may 21 have a copy. If not, then probably the 22 grievance chairperson's file would 23 probably have it there. 24 Q Okay. Prior to today, have you 25 ever spoken with Ms. deLeon's attorney.</p>	<p>1 Mr. Nichols? 2 A No. 3 Q Did you ever speak with a Robert 4 Flipping or anyone else from the 5 Pennsylvania Human Relations Commission 6 concerning Ms. deLeon's case? 7 A No. 8 Q And this might be hard to do 9 without making a copy, and I'm going to 10 try not to do it --- to take the time 11 to do it now, but let me just ask you 12 to take a look at the first page. 13 ATTORNEY HEATH: 14 And I'm going to mark 15 this entire exhibit collectively 16 as Roznowski Two. 17 (Roznowski Exhibit Number 18 Two marked for 19 identification.) 20 BY ATTORNEY HEATH: 21 Q Looking at the first page, which 22 is actually the last page of the 23 exhibit or the packet of notes I was 24 handed, which is the April 14th, 2001 25 notation, in reviewing those materials,</p>
<p>1 Q Were you aware that Ms. deLeon 2 was subject to a corrective action plan 3 for the 2002 --- actually 2001/2002 4 school year? Were you aware of that? 5 A Yes. 6 Q And were you aware that then 7 there was another corrective action 8 plan that was implemented with the 9 2002/2003 school year? 10 A Yes. 11 Q That plan then was subsequently 12 revised, were you aware of that? 13 A Yes. 14 Q Did you ever see any of the 15 action plans, review them, while you 16 were acting in the capacity of a 17 building representative? 18 A I believe in my folder I may 19 have a copy of that action plan. I 20 can't say for sure, but I think I may 21 have a copy. If not, then probably the 22 grievance chairperson's file would 23 probably have it there. 24 Q Okay. Prior to today, have you 25 ever spoken with Ms. deLeon's attorney.</p>	<p>1 Q Were you aware that Ms. deLeon 2 was subject to a corrective action plan 3 for the 2002 --- actually 2001/2002 4 school year? Were you aware of that? 5 A Yes. 6 Q And were you aware that then 7 there was another corrective action 8 plan that was implemented with the 9 2002/2003 school year? 10 A Yes. 11 Q That plan then was subsequently 12 revised, were you aware of that? 13 A Yes. 14 Q Did you ever see any of the 15 action plans, review them, while you 16 were acting in the capacity of a 17 building representative? 18 A I believe in my folder I may 19 have a copy of that action plan. I 20 can't say for sure, but I think I may 21 have a copy. If not, then probably the 22 grievance chairperson's file would 23 probably have it there. 24 Q Okay. Prior to today, have you 25 ever spoken with Ms. deLeon's attorney.</p>

<p>Page 26</p> <p>1 A Yes.</p> <p>2 Q Do you have any independent recollection of what occurred at that meeting on June 7th of 2002, concerning reviewing of the action plan?</p> <p>3 A Again, this meeting on June 7th, we went over the action --- or review of the past action plan. Claudette indicated that she needed more support from the administration, felt the action plan was effective, and she was going to get her own room at the time.</p> <p>4 She was traveling, and then she was going to get another language teacher's room when she retires. And they were indicated that to her. And they were also indicating the action plan follows the Appendix A.</p> <p>5 Q What is Appendix A?</p> <p>6 A Appendix A is our evaluation of teachers at the end of the school year, which has now changed. We have a different end-of-year evaluation.</p> <p>7 Q But at the time when you were saying they followed Appendix A, they</p>	<p>Page 27</p> <p>1 ATTORNEY NICHOLS:</p> <p>2 Okay. And that's the August 14th meeting you're referencing of 2001. August 5 14th, 2001.</p> <p>3 BY ATTORNEY HEATH:</p> <p>4 Now, the next notation on the next page is June 7th of 2002, so it's almost an entire year later. So you were not --- from these notes, is it correct to assume that you were not involved in any meetings concerning Claudette deLeon from the 2001-2002 school year until the end of the year?</p> <p>5 A Correct.</p> <p>6 Q Okay. Do you know if any meetings did occur with her and the administration during that school year?</p> <p>7 A Offhand, I do not know. I was not involved, so I could not say.</p> <p>8 Q This second to the last page here, there's --- and I'm looking at this part of the page which is the top portion. It says review of --- does that say past action plan?</p>
<p>Page 28</p> <p>1 A Yes.</p> <p>2 Q Do you have any independent recollection of what occurred at that meeting on June 7th of 2002, concerning reviewing of the action plan?</p> <p>3 A Again, this meeting on June 7th, we went over the action --- or review of the past action plan. Claudette indicated that she needed more support from the administration, felt the action plan was effective, and she was going to get her own room at the time.</p> <p>4 She was traveling, and then she was going to get another language teacher's room when she retires. And they were indicated that to her. And they were also indicating the action plan follows the Appendix A.</p> <p>5 Q What is Appendix A?</p> <p>6 A Appendix A is our evaluation of teachers at the end of the school year, which has now changed. We have a different end-of-year evaluation.</p> <p>7 Q But at the time when you were saying they followed Appendix A, they</p>	<p>Page 29</p> <p>1 followed School District policy, is that what you're saying? Or with all the instruments that was used by the District in the evaluations?</p> <p>2 A It's the instrument used by the District which was agreed upon between the District and the Association.</p> <p>3 Q Do you want to hand me that back again?</p> <p>4 A Sure.</p> <p>5 Q In looking at another part of your notes ---</p> <p>6 ATTORNEY HEATH:</p> <p>7 Can I just go off the record for a second?</p> <p>8 OFF RECORD DISCUSSION</p> <p>9 ATTORNEY HEATH:</p> <p>10 Okay. Back on the record.</p> <p>11 BY ATTORNEY HEATH:</p> <p>12 There's an indication here about a meeting. It says 11/13/02, Wednesday, 7:00 p.m., Nosker's house?</p> <p>13 A Nosker's (corrects pronunciation)</p>

<p>1 administrator. I can only assume that</p> <p>2 it was probably John Higgins since he</p> <p>3 was most of the time the administrator</p> <p>4 that we were dealing with. And this</p> <p>5 was talking about a grade not being in</p> <p>6 for the six weeks and a possible</p> <p>7 conference, parent/teacher conference</p> <p>8 would be the mother, perhaps.</p> <p>9 Q Do you recall at any time having</p> <p>10 a discussion with the administration</p> <p>11 about Ms. deLeon speaking to Robin</p> <p>12 Stockien about her son while in class</p> <p>13 in front of other students concerning</p> <p>14 his performance and his grade not being</p> <p>15 in and sleeping in class? Do you</p> <p>16 recall anything along those lines?</p> <p>17 A I remember they were talking</p> <p>18 about it at a meeting. Whether it was</p> <p>19 at this meeting, I don't recall if it</p> <p>20 was this meeting. But I do remember</p> <p>21 administration talking to Claudette</p> <p>22 about that, yes.</p> <p>23 Q And what did Claudette have to</p> <p>24 say about that issue?</p> <p>25 A I remember she indicated that</p>	<p>1 Q What does that mean?</p> <p>2 A That probably was something I</p> <p>3 should have done off that was done with</p> <p>4 negotiations.</p> <p>5 Q Okay. And then the next day</p> <p>6 there's 11/14/02, and there's</p> <p>7 information here that talked to mom</p> <p>8 about student. Claudette told mom to</p> <p>9 set up appointment, and then Claudette</p> <p>10 telling the mom kid was sleeping. Do</p> <p>11 you recall if this is about the</p> <p>12 Stockien boy?</p> <p>13 A I can't remember. Usually I</p> <p>14 would put a couple letters off on the</p> <p>15 side as an initial.</p> <p>16 Q Do you mention here Robin</p> <p>17 Stockien here as the mother?</p> <p>18 A I'm sorry. That would be ---</p> <p>19 we're referring to that.</p> <p>20 Q What do you recall about that</p> <p>21 incident?</p> <p>22 A Not too much. Just that we had</p> <p>23 a conference at the time, and in that</p> <p>24 meeting with Claudette, and apparently</p> <p>25 I did not write down the other</p>
<p>1 A Yes, that would be other</p> <p>2 individuals, yes.</p> <p>3 Q Okay. Now, I want to draw your</p> <p>4 attention for the moment to the spring</p> <p>5 of 2003. In reviewing your notes, it</p> <p>6 looks like you attended quite a few</p> <p>7 meetings concerning Claudette during</p> <p>8 that time frame. And some of these, I</p> <p>9 don't know if they are dated or if</p> <p>10 they're just simply --- I assume some</p> <p>11 are voluminous notes. Let me just give</p> <p>12 you some of these pages here.</p> <p>13 A Okay.</p> <p>14 Q And actually, let me start with</p> <p>15 January 3rd of 2003. It looks like</p> <p>16 there was a meeting on January 3rd,</p> <p>17 2003, concerning students issues and</p> <p>18 lesson plans, and an observation that</p> <p>19 occurred on December 19th, 2002. Then,</p> <p>20 and I more or less want to get a</p> <p>21 chronology of the meetings that</p> <p>22 occurred in that term.</p> <p>23 The meeting on 1/10/03, in which</p> <p>24 you were involved concerning Claudette</p> <p>25 relative to an observation that</p>	<p>1 she did it privately or out in the</p> <p>2 hallway. I'm not sure.</p> <p>3 Q And if, in fact, it were the</p> <p>4 case that this phone call did occur in</p> <p>5 the classroom in front of other</p> <p>6 students, was it your understanding</p> <p>7 that would be a violation of school</p> <p>8 policy due to student confidentiality,</p> <p>9 if it were, in fact ---</p> <p>10 A If it were ---</p> <p>11 Q --- in front of other students?</p> <p>12 A --- in front of other students,</p> <p>13 yes.</p> <p>14 Q All right. What is your</p> <p>15 understanding of the School District's</p> <p>16 policy concerning student</p> <p>17 confidentiality?</p> <p>18 A That information concerning a</p> <p>19 student is not to be expressed</p> <p>20 verbally, written, to other individuals</p> <p>21 if they're not one of their teachers.</p> <p>22 Q Or a parent?</p> <p>23 A Or a parent.</p> <p>24 Q And certainly not to other</p> <p>25 students, correct?</p>

Page 31

Page 33

Page 30

Page 32

<p>Page 34</p> <p>1 me again. Looking at them, there's a 2 March 3rd, 2003 meeting where John 3 Higgins was present, George Deshner, 4 Charles Heller, Dan H., which would be 5 Dan Hootman; is that correct? 6 A That is correct. 7 Q Claudette, and it looks like 8 yourself. And the issues that are 9 being discussed here are certain 10 questions relative to missing work of a 11 certain student, Evan, and also issues 12 as to whether or not Ms. deLeon was 13 discussing confidential student 14 information with people that had no 15 right to know anything, and would be in 16 violation of School District policy 17 concerning student confidentiality. 18 And it was brought up about her 19 sharing student discipline issues with 20 people outside of the District. 21 There's two pages of those notes. Can 22 I ask you to take a look at that? 23 WITNESS COMPLETES 24 BY ATTORNEY HEATH: 25 Q And those are dated March 3rd,</p>	<p>Page 35</p> <p>1 at her, as I have in my notes. 2 Q Do you recall if that time, that 3 pursuant to an investigation conducted 4 by Mr. Deshner, that --- or I'm not 5 sure if it was only Mr. Deshner, but 6 the administration, that the student 7 that was supposed to have observed the 8 other student calling Ms. deLeon a 9 whore denied that that ever happened? 10 A Yes. 11 Q And do you know anything else 12 about that? 13 A I'm not sure if I have notes on 14 it, but I do remember where the student 15 that supposedly heard the 16 information --- 17 Q Those initials will be P.B., if 18 that refreshes your recollection at 19 all. 20 A I think so. We sat in Mr. 21 Higgins' office. Claudette was there, 22 myself, John Higgins and the student. 23 And the question was asked if he did 24 hear it, and he said he did not. 25 Q If you want to give them back to</p>
<p>Page 36</p> <p>1 me again. Looking at them, there's a 2 March 3rd, 2003 meeting where John 3 Higgins was present, George Deshner, 4 Charles Heller, Dan H., which would be 5 Dan Hootman; is that correct? 6 A That is correct. 7 Q Claudette, and it looks like 8 yourself. And the issues that are 9 being discussed here are certain 10 questions relative to missing work of a 11 certain student, Evan, and also issues 12 as to whether or not Ms. deLeon was 13 discussing confidential student 14 information with people that had no 15 right to know anything, and would be in 16 violation of School District policy 17 concerning student confidentiality. 18 And it was brought up about her 19 sharing student discipline issues with 20 people outside of the District. 21 There's two pages of those notes. Can 22 I ask you to take a look at that? 23 WITNESS COMPLETES 24 BY ATTORNEY HEATH: 25 Q And those are dated March 3rd,</p>	<p>Page 37</p> <p>1 occurred, and then two pages of notes 2 concerning a February 25th, 2003 3 meeting. And this was to discuss 4 student discipline issues again, and 5 really basically just student 6 discipline issues. 7 Just independently and after 8 your reviewing these notes, do you 9 recall that in or about January of 2003 10 and February of 2003, there were 11 several meetings concerning student 12 discipline issues in Ms. deLeon's 13 class? 14 A Yes. 15 Q Do you have any independent 16 recollection of some of those issues 17 and what was discussed at these early 18 meetings that I mentioned? 19 A I don't recall. I'd have to 20 look at the notes to see. 21 Q Here you go. 22 A Thank you. On my notes from 23 February 25th, 2003, looking at it, we 24 have a student that supposedly called 25 Claudette a whore, and also did swear</p>

<p>Page 39</p> <p>1 Q What I'm going to do now is show 2 you a document we'll mark as Roznowski 3 Three, which are the notes of Joann 4 Willison. 5 (Roznowski Exhibit Number 6 Three marked for 7 identification.) 8 BY ATTORNEY HEATH: 9 Q She has already testified about 10 them, and it looks to me as if you were 11 present for the 3/19 meeting. And if 12 you look to where that is, that's the 13 third and fourth page of this exhibit. 14 It also appears that you were present 15 at the April 10th meeting, which 16 follows that March 19th, '03 meeting. 17 And I don't think from her notes you 18 were present at any of the other 19 meetings together, although --- I take 20 that back. It could be that you were 21 at the 3/24/03 meeting as well. You're 22 just not noted on there. 23 A Looking at this, maybe it's 24 stapled out of --- 25 Q Again, the order is how it was</p>	<p>Page 38</p> <p>1 said, and I did it quickly, correct me 2 if I'm wrong, --- 3 A Okay. 4 Q --- but it seems that the same 5 issues are being discussed, which is 6 whether or not Ms. deLeon, in fact, 7 copied people or discussed student 8 discipline issues and student issues 9 with people outside the District? 10 A Yes. 11 Q Other than her lawyer, such as 12 the PHRC investigator, and other 13 individuals. Do you recall that being 14 discussed? 15 A It was being discussed. George 16 was asking the question if this 17 information was said to her lawyer, to 18 PSA lawyer. And she indicated only 19 the files that she had for herself were 20 being sent to her lawyer. 21 Q Do you recall whether or not at 22 these meetings any information, such as 23 correspondence or student discipline 24 logs or other information, was given to 25 you or to Claudette to look at that</p>
<p>Page 40</p> <p>1 making your memory any clearer that 2 there was quite a few meetings in the 3 spring of 2003? 4 A Yes, there were a number of 5 meetings that we had in the spring 6 during March, as I can see. This one 7 being two in the same day. It would be 8 at 7:30 in the morning and then later 9 in the day, 1:40. 10 Q Now, there's notations here that 11 then there's a meeting 3/19 of '03. 12 And I don't know, some of these don't 13 necessarily seem to be dated. And then 14 there's a meeting 3/24 of '03. Then 15 there's little notes, and I don't think 16 these are dated either. 17 A Yes, sometimes I was called, 18 asked to come down, and therefore 19 whatever I had in hand. 20 Q There's 3/28/03, April 4th of 21 '03 and then April 10th of '03. That's 22 what I have for the remainder of the 23 meetings for that time frame. If you 24 can hand me that now. 25 A Sure.</p>	<p>Page 38 - Page 41</p> <p>1 said cc, Robert Flipping, PHRC? Did 2 you ever see anything where Mr. 3 Flipping was copied on it? 4 A I don't have with me, but I do 5 remember seeing that at the bottom it 6 was carbon copied to somebody that I 7 did not know. I think it was her 8 lawyer, but I do remember seeing it. 9 But I don't know that for a fact. 10 Q But it could have been a PH --- 11 if it said Flipping, then it could have 12 been --- did you definitely see that? 13 A I remember seeing other names 14 besides administration. 15 Q School District personnel? 16 A Yes. 17 Q Okay. Do you want to give that 18 back to me then? 19 A Sure. 20 Q Thank you. That meeting was in 21 March 3rd of 2003, and it looks as if 22 there was another meeting March 4th, 23 2003, and this was concerning issues of 24 student grades. That was the next day. 25 In reviewing these documents, is it</p>

<p>Page 43</p> <p>1 Q Thank you. 2 A Uh-huh (yes). 3 Q The next page that I have from 4 what you produced today, there are 5 three small notebook papers saying from 6 the desk of Carl Roznowski. And 7 there's no date on there. And 8 similarly, it looks --- when you're 9 talking about Mike, are you meaning 10 Mike Dolecki typically, or are you 11 meaning Mike someone else? Do you want 12 to take a look at it? 13 A Yes, this was with --- it is 14 Mike Dolecki, and this is the meeting 15 in which Claudette, myself, Mike 16 Dolecki and John Higgins had in Mike's 17 office. He did an observation, and I'm 18 not sure, probably Mike has it on his 19 calendar what day it was, but I don't 20 remember. 21 Q Just for your own information, 22 it was produced in between the 3/24/03 23 notes and the 3/28/03 notes, and I'm 24 going to show you. You already looked 25 at the 3/24/03 notes. Let me show you</p>	<p>Page 42</p> <p>1 given to me. And it actually looks 2 from --- looking at your notes, that 3 you were, in fact, present at the March 4 24th, 2003 meeting. And that would be 5 --- just say how many pages in it is on 6 the exhibit. 7 A I have it. 8 Q You have it? 9 A I'm at that meeting. 10 Q Okay. And at this meeting, it 11 looks as though the action plan is 12 being discussed or the classroom 13 management is being discussed, and 14 certain reading assignments are being 15 provided. Do you have any independent 16 recollection of that meeting? 17 A I do remember Mr. Higgins going 18 over the action plan of what she needs 19 to follow through on reading of 20 indicated chapters and pages. I have 21 that in my notes. As I look at it, I 22 don't know the exact pages there, but I 23 do remember him illustrating certain 24 pages that he wanted Claudette to read. 25 Q And how did that meeting go, if</p>
<p>Page 44</p> <p>1 A Okay. 2 Q --- compared with Ms. Willison's 3 notes? I'm going to show you several 4 pages here. And remember, first in 5 time's closer to the bottom. It looks 6 like these are the 3/19 and 3/24 notes 7 that you took, those series of pages I 8 just gave you; is that correct, do you 9 believe? Are they 3/24 and 3/19? 10 A Yes, they would be two, looking 11 at this last page, which would probably 12 be 3/19, because it indicates at the 13 end that our next meeting is on the 14 24th. In looking at the information 15 here, I'm not sure which date these two 16 pages are. It may be an earlier date, 17 it may be part of 19, so I place two 18 pages of the 24th, two pages for the 19 19th, and --- 20 Q Two pages you don't know? 21 A I'm not sure of, because I do 22 have at the top all those in 23 attendance, but I didn't write a date 24 on it. So it may be part of that and 25 it may not.</p>	<p>Page 45</p> <p>1 You recall? 2 A That --- 3 Q Was it confrontational, was it 4 fine, was it positive? How'd it go? 5 A I could not remember. 6 Q Okay. Looking at Joann's notes, 7 the next meeting, where I believe you 8 were in attendance, ---? 9 A The 19th. 10 Q Yeah. Actually, that's a 11 previous meeting, 3/19/03. At that 12 time the action plan was discussed. 13 You're noted at the top as being 14 present at that meeting? 15 A Yes. 16 Q And I think in looking at your 17 notes, these were the ones I don't 18 think are necessarily dated, but I 19 think it pretty much follows what Ms. 20 Willison's notes say. And I'm just 21 going to show you several pages and see 22 if you can determine --- well, let's 23 see here, if you can determine what 24 notes go with what dates and what 25 meetings ---</p>

<p>Page 49</p> <p>1 A No, I don't. 2 Q Don't remember. I'm going to 3 ask you to take a look at Joann 4 Willison's notes for April 10th of 5 2003, which notes that you were 6 present. And prior to discussing this 7 specifically, do you have any 8 recollection of any meetings with the 9 administration where Claudette was 10 looking down at the ground, and the 11 administration asked her to be more 12 engaged in the conversation? 13 A I do recall that. At what 14 particular meeting, I could not tell 15 you. 16 Q What do you recall? 17 A They did ask her to look at her 18 while we're having a conversation? 19 Q Look at them, you mean? 20 A Look at them or look at least in 21 their direction. 22 Q In looking at the bottom of the 23 first page of Joann Willison's notes on 24 the April 10th, 2003 meeting, it says 25 at the beginning, C-L, which is</p>	<p>Page 47</p> <p>1 remarks, ask only questions relevant to 2 the class. Do you recall what that 3 references? 4 A That is referring, if I recall, 5 is what she is to express to the 6 students, for the students to be on 7 time and ask questions which are 8 relevant to the class, and not to 9 something else. 10 Q Okay. What else was discussed 11 at that meeting? 12 A Claudette gave her discipline 13 log, and George Deshner did an 14 observation, and he did not have a 15 chance to write it up, which was two 16 days prior, and indicated he will do 17 that very shortly. He also indicated 18 that for another reason, he checked 19 Chris Fisher, I believe it was, his 20 locker and found five notebooks for 21 Spanish and five Spanish textbooks. 22 Q Who's Chris Fisher? 23 A A student, that's all I know. 24 Q And they were just ---? 25 A I have no idea</p>
<p>Page 48</p> <p>1 Q You don't remember whose 2 notebooks, why they'd be in there? 3 A No. 4 Q And was this during the 5 discussion of missing work assignments 6 of other students that was an issue 7 with Ms. deLeon? 8 A This was brought out by Mr. 9 Deshner, and he just brought it out at 10 the time that he found this, and he was 11 informing all of us at the meeting. 12 Q Do you recall if Ms. deLeon had 13 any response to this? 14 A No. 15 Q No, you don't recall? 16 A I don't recall, no. And the 17 other things which we've mentioned, 18 another student about turning his work 19 in slowly. Mr. Deshner gave his 20 opinion about additional notebooks. 21 Then we got into classroom management. 22 Q And do you have any recollection 23 of anything that was specifically 24 discussed concerning classroom 25 management issues?</p>	<p>Page 46</p> <p>1 the one page of the 3/28/03 notes. Do 2 you believe it was a separate meeting? 3 A Oh, yes. This meeting, we did 4 come up to Mike's office. It was a 5 separate meeting, yes. 6 Q And then the 3/28/03 meeting 7 that you have in your hand, what was 8 discussed at that meeting? 9 A We were going through the 10 guidelines for punishment effectively. 11 Q Punishment of whom? 12 A This would have been, I would 13 assume, students. It's guideline five 14 and guideline one. My own assumption 15 would be it's from the textbooks she 16 was instructed to read. 17 Q If you can hand me that back, 18 please? The next meeting that I have, 19 and it looks like, again, that Joann 20 Willison was not present at that 21 meeting. It just says John, George, 22 second period, April 4th, 2003. On 23 the first page, it's a two-page 24 document, it says on time, be in your 25 seat, respectful, no derogatory</p>

<p>Page 53</p> <p>1 Here I am. I see that in Joann's 2 notes. From what I do remember is that 3 both parties were becoming, I'll say, 4 heated. And at that time, if I 5 remember correctly, Claudette did stand 6 up and --- I'm trying to remember 7 because this is back two and a half 8 years ago. I did grab hold of her, I 9 think, by the arms. I think Joann had 10 her by the hand, arm, wrist. And at 11 that point in time, we dismissed 12 ourselves from the meeting. I thought 13 the meeting was over at the time. 14 Q Why did you grab her by the arm? 15 A She was moving from her seat to 16 Mr. Deshner, in which they were in a 17 heated discussion. 18 Q We see towards the bottom of 19 that page, it says building reps 20 couldn't stop her, administration 21 couldn't stop her. Building reps 22 finally took her out as one squeezed 23 her wrist, the other was telling her to 24 stop. Do you recall that? 25 A I recall, yes.</p>	<p>Page 51</p> <p>1 Association that the meeting is moving 2 forward and questions are being prompt 3 correctly. When I say prompt is to 4 make sure everything was flowing and 5 making sure procedure is being 6 followed. And probably my notes were 7 probably not as extensive as Joann, who 8 has been designated as more of the note 9 taker. 10 Q When did that designation occur? 11 A We kind of fell into it. She 12 being --- I'd probably say she's 13 probably a better note taker for 14 writing quickly. And I was doing more 15 responding to whatever was in the 16 meeting. 17 Q Whose decision was it to have 18 two building representatives present 19 for some of these meetings, especially 20 in the spring of 2003? 21 A I think probably at the time Pat 22 Deardorff was our president, and she 23 resigned or I should say did not seek 24 election. And she felt it would be 25 better to have another female in the</p>
<p>Page 52</p> <p>1 meetings rather than just have all 2 males. So Joann was asked to become 3 part of the process. 4 Q And could it have been someone 5 other than Pat Deardorff that suggested 6 that? 7 A It could be, could be, because 8 it was --- 9 Q I don't believe that at that 10 time she was --- 11 A She wasn't president. 12 Q --- president. 13 A She was --- when you leave 14 office, it's in our constitution that 15 the past president becomes the second 16 vice president, so she still had a 17 position. 18 Q Okay. Now, looking at Joann's 19 notes, second page of that date of 20 April 10th of 2003, here it says C-L 21 got belligerent. Was told by building 22 reps to calm down and not threaten 23 administration. She didn't listen. Do 24 you recall anything about that? 25 A I'm trying to --- oh, okay.</p>	<p>Page 50</p> <p>1 Claudette, was handed a sealed envelope 2 which contained her most recent 3 classroom observation. She let it lay 4 without opening it until told. Once 5 opened, she refused to read it after 6 being prompted by Association. Do you 7 recall that occurring? 8 A Yes. 9 Q And who prompted her to open the 10 envelope? 11 A I'm not sure if it was myself or 12 Joann, to have her open it up at the 13 time because administration was hoping 14 that she would open it up. So I'm not 15 sure if it was both of us at the same 16 time to have her open the letter up. 17 Q And do you have any recollection 18 of how that meeting ended up going that 19 day? I'll let you take a look at your 20 notes from that day. 21 A All right. 22 Q Which is about a half a page. 23 A Yeah. There's some --- respond 24 to my notes here. Usually I am the 25 individual who is making sure for the</p>

<p>1 Q That she had to be escorted out</p> <p>2 of the room; is that right?</p> <p>3 A Yes.</p> <p>4 Q Then it says on the next page,</p> <p>5 third page there, tried to calm her,</p> <p>6 couldn't. She wanted to go home. Were</p> <p>7 you also trying to calm her down?</p> <p>8 A Yes. We went to the closest</p> <p>9 room out of Mr. Deshner's, and I'm not</p> <p>10 sure if it was anybody's room then. It</p> <p>11 could have been a principal's room, I'm</p> <p>12 not sure.</p> <p>13 Q Mr. Morgan?</p> <p>14 A It could have been his office.</p> <p>15 And we went in there to calm down</p> <p>16 Claudette. And I'm not sure who came</p> <p>17 in at the time, and we did ask</p> <p>18 permission to allow her to go home.</p> <p>19 Q When you were trying to calm her</p> <p>20 down, what was she doing? What was she</p> <p>21 doing?</p> <p>22 A I could see her nerves, she was</p> <p>23 upset.</p> <p>24 Q Had she been yelling? Was she</p> <p>25 crying?</p>	<p>1 ATTORNEY NICHOLS:</p> <p>2 Uh-huh (yes).</p> <p>3 ATTORNEY HEATH:</p> <p>4 Do you want to mark that</p> <p>5 as Four, and then give it to the</p> <p>6 witness?</p> <p>7 (Roznowski Exhibit Number</p> <p>8 Four marked for</p> <p>9 identification.)</p> <p>10 BY ATTORNEY HEATH:</p> <p>11 Q In looking at Exhibit Four,</p> <p>12 which is the March 18th, 2003 letter,</p> <p>13 which was the five-day suspension</p> <p>14 without pay signed by Mr. Dolecki, are</p> <p>15 you copied on this letter?</p> <p>16 A I have a copy, yes.</p> <p>17 Q Are you copied on the letter?</p> <p>18 Are you cc'd on the letter?</p> <p>19 A Yes.</p> <p>20 Q Did you receive a copy of this</p> <p>21 letter? Did you actually receive it at</p> <p>22 the time?</p> <p>23 A Without checking my binder, I</p> <p>24 can't say yes for sure.</p> <p>25 Q There doesn't seem to be any</p>
<p>1 Q That I can't say for sure. I</p> <p>2 think so. I did not mark it down in my</p> <p>3 notes if she was. But knowing the</p> <p>4 situation, I would almost say yes, but</p> <p>5 I can't swear by it.</p> <p>6 Q Looking at your notes and Ms.</p> <p>7 Willison's notes for February --- I'm</p> <p>8 sorry, April 11th, 2003, which is the</p> <p>9 next day.</p> <p>10 A Uh-huh (yes).</p> <p>11 Q And looking at the second page</p> <p>12 of Ms. Willison's notes, there is an</p> <p>13 indication to --- and that's the first</p> <p>14 page of the exhibit, first and second</p> <p>15 pages of the exhibit.</p> <p>16 A Okay.</p> <p>17 Q That she was given an overall</p> <p>18 unsatisfactory rating, and that she was</p> <p>19 suspended as of that time without pay,</p> <p>20 and there was going to be a</p> <p>21 recommendation to the Board for her</p> <p>22 termination, do you recall that?</p> <p>23 A Yes.</p> <p>24 Now, prior to that time, had</p> <p>25 there been a five-day suspension</p>	<p>1 without pay, do you recall?</p> <p>2 A I recall that, yes. I can't</p> <p>3 remember when, but I do remember.</p> <p>4 ATTORNEY HEATH:</p> <p>5 We'll mark this --- I'll</p> <p>6 let you see that first.</p> <p>7 ATTORNEY NICHOLS:</p> <p>8 Okay.</p> <p>9 ATTORNEY HEATH:</p> <p>10 Let me just do some</p> <p>11 housekeeping here. The Joann</p> <p>12 Willison's notes, the extra copy</p> <p>13 will be Roznowski Three; is that</p> <p>14 right, or is it Two? It will be</p> <p>15 all the notes. Would it be the</p> <p>16 last page of your notes?</p> <p>17 A Oh, yes.</p> <p>18 ATTORNEY HEATH:</p> <p>19 Well, keep it. Actually,</p> <p>20 keep it for a second.</p> <p>21 A Okay.</p> <p>22 ATTORNEY HEATH:</p> <p>23 So the Joann Willison's</p> <p>24 notes are Three, and this is</p> <p>25 going to be Four, correct?</p>

<p>Page 61</p> <p>1 A. This was the time that she 2 was ---? 3 Q. Suspended without pay and then 4 eventually there was a recommendation 5 for termination. 6 A. There was --- it was supposed to 7 be set up in which Joann was to be with 8 her at a later date for her to collect 9 her personal effects. Joann was unable 10 to make it, and therefore I said I 11 would do it. And I can't remember the 12 date. I didn't log it in because it 13 was after school, and that was the last 14 time I had a meeting with Claudette. 15 That was to pick up her personal 16 effects. 17 Q. Do you recall anything about 18 what was discussed at that time? 19 A. No, we didn't have much of a 20 conversation. She was just collecting 21 her personal effects. That was it. 22 Q. Did you have any discussions 23 with her prior to the arbitration that 24 occurred in 2004, or the arbitrations I 25 should say, wherein you testified? Did</p>	<p>Page 59</p> <p>1 Q. Would they have been kept in a 2 separate binder? 3 A. Sometimes they're continuous in 4 my notes. 5 Q. Could you just take a look for 6 me to see if you have any other notes 7 about meetings you may have had with 8 Ms. deLeon individually as opposed to 9 with the administration? Would you 10 look for those? 11 A. I can. 12 Q. And you can just present them to 13 your Counsel and he can make the 14 determination if there's any privilege 15 issues. 16 A. Okay. 17 Q. Okay. Looking at your notes for 18 the April 11th meeting, I'm looking --- 19 actually, I'm looking at Ms. Willison's 20 notes. Do you recall there being a 21 discussion also about receiving calls 22 from her doctor, her being Claudette's, 23 doctor, and from a pharmacy? 24 A. Yes. 25 Q. What do you recall specifically</p>
<p>Page 60</p> <p>1 about that being brought up? 2 A. They were asking at the 3 beginning of the meeting on April 11th 4 from what I'm looking at in my notes, 5 asking if she ever made a phone call to 6 --- outside during class, and they also 7 asked about whether or not she ever 8 received a phone call from outside from 9 a pharmacy. 10 Q. And do you recall whether or not 11 she admitted that she took calls from 12 her doctor and pharmacy during class? 13 A. That I do not know. I did not 14 mark that down. I just have the 15 questions there. Joann was there. If 16 she indicated would be the only way 17 that I would know. 18 Q. And if you look at her notes on 19 the front page, it does indicate that 20 it was admitted, the bottom of the 21 first page. After the April 11th, 2003 22 meeting, did you have any other 23 meetings with Ms. deLeon, either in 24 person or by phone or by e-mail, 25 letter?</p>	<p>Page 58</p> <p>1 specific notations about ever having a 2 discussion with Ms. deLeon about this 3 letter specifically. Do you recall 4 having any discussion with her? 5 A. You mean discussion on this? 6 Q. About this five-day suspension. 7 A. I don't recall offhand. 8 Q. With regard to the notes that 9 you produced today, was it your 10 practice simply to keep notes of the 11 meetings that you had themselves, as 12 opposed to with the administration? 13 A. Just with --- well, 14 administration, yes. 15 Q. Did you ever have meetings just 16 simply with union members --- 17 A. Yes. 18 Q. --- about administrative issues 19 and problems and that kind of thing? 20 A. We had meetings in which --- 21 with the individual. 22 Q. Now, did you keep notes about 23 those meetings? 24 A. I may have some of those notes. 25 Usually ---.</p>

<p>1 Thank you.</p> <p>2 EXAMINATION</p> <p>3 BY ATTORNEY NICHOLS:</p> <p>4 Q Mr. Roznowski, I'm Caleb</p> <p>5 Nichols. I represent Ms. deLeon. I've</p> <p>6 just got a few questions I'd like to</p> <p>7 ask you.</p> <p>8 A Uh-huh (yes).</p> <p>9 Q As I recall, you said that your</p> <p>10 service was in dealing with seniority</p> <p>11 factors?</p> <p>12 A Yes.</p> <p>13 Q Is that correct?</p> <p>14 A Yes.</p> <p>15 Q And that's a committee; isn't</p> <p>16 it? The name of a committee?</p> <p>17 A It's not a committee, it's a</p> <p>18 position. The computer resource person</p> <p>19 is a dual job. One is to have the</p> <p>20 seniority in the district of the</p> <p>21 teachers who are permanently, regularly</p> <p>22 hired by the District, not as I would</p> <p>23 say, permanent subs. There's no</p> <p>24 seniority in that. The second part of</p> <p>25 that position is I'm also the person</p>	<p>1 Q Vis--vis those who are not</p> <p>2 tenured. Would that be a fair ---</p> <p>3 A Yes.</p> <p>4 Q --- assumption or conclusion to</p> <p>5 reach?</p> <p>6 A Uh-huh (yes).</p> <p>7 ATTORNEY HEATH:</p> <p>8 You have to say yes or</p> <p>9 no.</p> <p>10 A Yes.</p> <p>11 BY ATTORNEY NICHOLS:</p> <p>12 Q Now, you used the term traveling</p> <p>13 teacher when you referred to Ms.</p> <p>14 deLeon, right?</p> <p>15 A Correct.</p> <p>16 Q And when you use that term, what</p> <p>17 is your understanding?</p> <p>18 A A traveling teacher is a teacher</p> <p>19 who does not have a room to themselves</p> <p>20 for the length of the day.</p> <p>21 Q And was that characteristic of</p> <p>22 Mr. deLeon's status post-2001?</p> <p>23 A I don't know.</p> <p>24 Q That school year?</p> <p>25 A I couldn't say yes or no because</p>
<p>1 You have any conversations with Ms.</p> <p>2 deLeon prior to those arbitrations or</p> <p>3 any contact with her?</p> <p>4 A Not that I remember, no.</p> <p>5 Q Can you give me back that last</p> <p>6 page of notes?</p> <p>7 A This one?</p> <p>8 Q Your notes.</p> <p>9 A Oh.</p> <p>10 ATTORNEY HEATH:</p> <p>11 I'm going to give this to</p> <p>12 you now, so you can mark it.</p> <p>13 BY ATTORNEY HEATH:</p> <p>14 Q During the April 10th meeting,</p> <p>15 which was the one that got fairly</p> <p>16 heated where Ms. deLeon had to be</p> <p>17 escorted out by you and Ms. Williamson,</p> <p>18 do you remember her calling Mr. Deshner</p> <p>19 a liar?</p> <p>20 A I don't recall that. I didn't</p> <p>21 mark it down, so I can't say yes or no</p> <p>22 to that.</p> <p>23 ATTORNEY HEATH:</p> <p>24 Can you excuse me a</p> <p>25 second? I have nothing further.</p>	<p>1 that helps develop the salary schedule</p> <p>2 in negotiations.</p> <p>3 Q Okay. Now, in the course of</p> <p>4 performing your duties relating to</p> <p>5 seniority matters, do issues of tenure</p> <p>6 ever crop up as seniority rights? And</p> <p>7 I ask you --- the same question, I'm</p> <p>8 asking about issues you can speak, if</p> <p>9 you don't. If you don't, say you don't</p> <p>10 know. But a tenured teacher, is it the</p> <p>11 standard by which a tenured teacher can</p> <p>12 be discharged, is that more stringent</p> <p>13 than a non-tenured teacher, do you</p> <p>14 know?</p> <p>15 A I don't know. No, I really</p> <p>16 don't know. Just knowing that tenured</p> <p>17 teachers, I think it's three years now,</p> <p>18 I'm not sure, so I can't say if the</p> <p>19 requirements are any different.</p> <p>20 Q Does tenured, the concept of</p> <p>21 tenured as used in the education-wise</p> <p>22 as Ms. deLeon was a tenured as of 1993;</p> <p>23 okay? That carries with it certain</p> <p>24 privileges, right?</p> <p>25 A I would think.</p>

<p>Page 66</p> <p>1 A. What was that date again? 2 BY ATTORNEY NICHOLS: 3 June 7, 2002. 4 A. No, I don't. Not on June --- 5 Q. It could have been another 6 meeting. 7 A. Yeah, I think that was 8 towards --- 9 Q. But anyway, the issue was the 10 same? 11 A. Yes, it is. 12 Q. And you're trying to get Ms. 13 DeLeon a classroom, right? 14 A. We were trying to have four 15 rooms on the same floor so there would 16 be less traveling, so that she would 17 not need to use the elevator to carry 18 her cart, all of her stuff. So we were 19 trying to be on the same floor as --- 20 trying to get the best condition. 21 Q. Based upon your --- now, you 22 have longevity teaching, the school 23 kids, is that right? 24 A. Yes. 25 Q. And you've mentioned so many</p>	<p>Page 67</p> <p>1 principal. 2 Q. Okay. And do you know by what 3 methods he or she, the building 4 principal, makes those assignments? 5 A. No, I do not. 6 Q. Is it in terms of tenure? Is it 7 in terms of seniority or what? You 8 don't know? 9 A. That I do not know. 10 Q. You also reference a June 7, 11 2002 meeting involving the reviewing of 12 an action plan? 13 A. Uh-huh (yes). 14 Q. Okay? 15 A. Yes. 16 Q. And you said that on that 17 occasion Ms. DeLeon felt that she was 18 going to get her own room, classroom I 19 take it, right? 20 ATTORNEY HEATH: 21 Do you want to look at 22 your notes? 23 A. Yes. 24 ATTORNEY HEATH: 25 Toward the back.</p>
<p>Page 68</p> <p>1 A. What was that date again? 2 BY ATTORNEY NICHOLS: 3 June 7, 2002. 4 A. No, I don't. Not on June --- 5 Q. It could have been another 6 meeting. 7 A. Yeah, I think that was 8 towards --- 9 Q. But anyway, the issue was the 10 same? 11 A. Yes, it is. 12 Q. And you're trying to get Ms. 13 DeLeon a classroom, right? 14 A. We were trying to have four 15 rooms on the same floor so there would 16 be less traveling, so that she would 17 not need to use the elevator to carry 18 her cart, all of her stuff. So we were 19 trying to be on the same floor as --- 20 trying to get the best condition. 21 Q. Based upon your --- now, you 22 have longevity teaching, the school 23 kids, is that right? 24 A. Yes. 25 Q. And you've mentioned so many</p>	<p>Page 69</p> <p>1 principal. 2 Q. Okay. And do you know by what 3 methods he or she, the building 4 principal, makes those assignments? 5 A. No, I do not. 6 Q. Is it in terms of tenure? Is it 7 in terms of seniority or what? You 8 don't know? 9 A. That I do not know. 10 Q. You also reference a June 7, 11 2002 meeting involving the reviewing of 12 an action plan? 13 A. Uh-huh (yes). 14 Q. Okay? 15 A. Yes. 16 Q. And you said that on that 17 occasion Ms. DeLeon felt that she was 18 going to get her own room, classroom I 19 take it, right? 20 ATTORNEY HEATH: 21 Do you want to look at 22 your notes? 23 A. Yes. 24 ATTORNEY HEATH: 25 Toward the back.</p>

<p>1 that were traveling teachers when they 2 moved into the building. Helen Carr 3 (phonetic) was one of them, and just 4 recently she got a room. 5 Q But that was by choice, you 6 said, right? They chose? 7 A Not her. When she bid into a 8 position up at the high school, she was 9 a traveling teacher. 10 Q And how many years, do you know, 11 was she tenured and how many years she 12 had? 13 A Oh, yes. She had a number of 14 years, yes. 15 Q Can you point to others, 16 identify others in similar 17 circumstances? 18 A I'm trying to think. I'm not 19 sure, the other individual may or may 20 not be Denny McDonald. These are 21 teachers who bid out, move out from the 22 middle school to the high school, when 23 a position became vacant. 24 Q Is that saying that their status 25 as a traveling teacher was a transfer,</p>	<p>1 review the notes of Ms. Willison 2 to make sure that we're talking 3 about the same meeting as the 4 action plan was talked about 5 multiple times. 6 ATTORNEY NICHOLS: 7 It may very well have 8 been just the testimony in terms 9 of --- I thought that it was 10 consistency on the record that 11 Ms. deLeon had consistently 12 stated her dissatisfaction with 13 the action plan. 14 BY ATTORNEY NICHOLS: 15 Q I hear you say that at least the 16 one meeting you heard Ms. deLeon had 17 expressed approval. And I do recall 18 that Ms. Willison stated the very 19 opposite this morning. 20 ATTORNEY HEATH: 21 I object. I think it's 22 mischaracterizing what the prior 23 witness said, and also there's a 24 lack of foundation. But you may 25 answer.</p>
<p>1 to vis- -vis having to go to and from 2 seven different classes? 3 ATTORNEY HEATH: 4 Objection to form. And 5 I'm not sure what the question 6 was. Go ahead. 7 BY ATTORNEY NICHOLS: 8 Q Do you understand my question, 9 Mr. Roznowski? 10 A Could you say it over again? 11 Q My question essentially is 12 having such as we're speaking on, being 13 a tenured teacher at that juncture, at 14 that point, I think having at least ten 15 year's experience, is it a common --- 16 isn't it uncommon that she would be 17 relegated to a status of, you know, of 18 being a traveling teacher, quote, 19 traveling teacher, closed quote? 20 ATTORNEY HEATH: 21 Same objection to form. 22 BY ATTORNEY NICHOLS: 23 Q You may answer. 24 A There are a couple teachers who 25 have served the District a long time</p>	<p>1 It was not a permanent, second 2 condition or permanent status? 3 A They would get their own room 4 once somebody retires in that position, 5 unless there was an addition onto the 6 school. 7 Q You mentioned that Ms. deLeon 8 mentioned in one of the meetings that 9 the action plan was working. Is that a 10 correct statement on your part? 11 A I think that was, yes. 12 Q The reason I raise that question 13 is because Ms. Willison just testified 14 this morning prior to you. And as I 15 understand it, Ms. deLeon had expressed 16 dissatisfaction with the action plan, 17 vis- -vis the case management plan. 18 You know, I just want to be clear. 19 There seems to be an inconsistency 20 of ---. 21 ATTORNEY HEATH: 22 I object. Lack of 23 foundation. You're not saying 24 specifically what meeting, and I 25 think he should be able to</p>

<p>Page 76</p> <p>1 the disposition of this matter, do you 2 know? The committee took it up. What 3 was the disposition? Did they find --- 4 what was the determination that was 5 made, if any? 6 All you're saying the committee, 7 investigation committee, I do not know. 8 That's administration. 9 QOh, is it now, okay. 10 All have no control or power over 11 that. 12 QNow, moving forward here a 13 couple more questions. April 10, 2004, 14 you were in a meeting in which you say 15 you observe Ms. deLeon, she was angry. 16 you say. What did you observe? She 17 was visibly moving from her seat? 18 AYes. 19 QAre you sure there was visible 20 movement from her seat? 21 AShe did --- 22 QIn which direction? Toward whom 23 or what? To leave the room, exit? 24 ATTORNEY HEATH: 25 Objection. Asked and</p>	<p>Page 74</p> <p>1 AThe meeting that I am looking 2 at, which is June 7th, that would have 3 been an in-service day. That's the 4 only way in which we would have met at 5 8:13 in the morning, because that would 6 be first period. I do have --- maybe I 7 had written it wrong, I don't know. 8 But I do have that she indicated 9 she wants more support from the 10 administration, and felt the action 11 plan was effective. So I'm not sure if 12 it was working, but effective. That's 13 what I have written down. 14 ATTORNEY HEATH: 15 What was the date of it? 16 AJune 7th, 2002. 17 BY ATTORNEY NICHOLS: 18 QAll right. Now, this particular 19 occasion, the date escapes me, maybe 20 you can jog my memory, refresh my 21 memory, on where a student was reported 22 to have reportedly called Ms. deLeon a 23 derogatory term, quote, a whore? Know 24 what I'm saying? 25 AOkay.</p>
<p>Page 77</p> <p>1 answered. 2 All I remember how the room was 3 set up, we were at a table such as 4 this, it's all one table. Claudette is 5 at this head of the side. Joann is on 6 this side. I am on the opposite side. 7 ATTORNEY HEATH: 8 Just for the record so 9 when we read it again we can 10 indicate a --- but you're saying 11 that Claudette was at the head 12 of the table? 13 ATable. 14 ATTORNEY HEATH: 15 You were to her right as 16 she's facing ---? 17 All was to her left. 18 ATTORNEY HEATH: 19 To her left, and Joann 20 was to the right? 21 AJoann was to the right. 22 Directly across from her, if I remember 23 correctly, is George Deshner. 24 ATTORNEY HEATH: 25 Across from Claudette?</p>	<p>Page 75</p> <p>1 QAnd then there was a second 2 student who I'm told vouched for having 3 heard him, then recanted and said he 4 didn't hear such a word, and that was 5 the discussion, that particular 6 discussion of the committee that you 7 met, right, that particular ---? 8 ATTORNEY HEATH: 9 I object. Object to 10 form. You can answer it. 11 AClaudette indicated that this 12 student heard --- overheard the other 13 student calling her a whore. We met 14 with the student in Mr. Higgins' 15 office, and asked him at the time. 16 Now, I've never met the student, so 17 this is the first time meeting him. 18 And Claudette --- now, I'm not sure if 19 it was Claudette or John that asked 20 him, that I don't remember, but he was 21 asked, did you hear this? 22 BY ATTORNEY NICHOLS: 23 QUh-huh (yes). 24 AAnd he indicated he did not. 25 QHe did not? Okay. And what was</p>

<p>Page 79</p> <p>1 doorway. It was a very heated 2 discussion between Claudette and Mr. 3 Deshner. Both of them at the time were 4 raising their voice. And as a union 5 representative, I did not think it 6 would be best to continue the meeting 7 at that time. 8 Q You had talked about the 9 traveling teacher issue. The 10 administration's placing someone on a 11 schedule as a traveling teacher is not 12 a violation of the collective 13 bargaining agreement, is that correct? 14 A That is correct. 15 Q It's not a grievable issue, in 16 other words? 17 A That's correct. 18 Q You mentioned a couple of 19 people. Helen Carr, is she Hispanic? 20 A No. 21 Q Is Denny McDonald Hispanic? 22 A No. 23 Q Shawn Brown? 24 A No. 25 Q Isn't it a fact also that prior</p>	<p>Page 81</p> <p>1 right? 2 A Ms. Willison, yes. 3 Q Okay. Ms. Willison did testify 4 this morning that she did not at any 5 time observe Ms. deLeon make any 6 physical movements from her chair. 7 That's what she testified this morning 8 on the record. Is this the same 9 meeting? 10 ATTORNEY HEATH: 11 Objection. 12 Mischacterizes what the 13 witness testified to. 14 ATTORNEY NICHOLS: 15 Well, what did the 16 witness say then? 17 ATTORNEY HEATH: 18 The record will reflect 19 what was said was she doesn't 20 recall. 21 ATTORNEY NICHOLS: 22 I'm just simply pointing 23 out the inconsistencies, what 24 appears as inconsistencies in 25 the testimony.</p>
<p>Page 80</p> <p>1 ATTORNEY HEATH: 2 There's no inconsistency. 3 ATTORNEY NICHOLS: 4 Okay. Just a minute. 5 Excuse me. 6 OFF RECORD DISCUSSION 7 ATTORNEY NICHOLS: 8 Okay. Well, I don't 9 think I have any more questions, 10 Mr. Roznowski. Thank you. 11 RE-EXAMINATION 12 BY ATTORNEY HEATH: 13 Q Mr. Roznowski, I just have a 14 couple follow-up questions. I believe 15 you had testified earlier that Ms. 16 deLeon actually physically got up out 17 of her chair and was going towards Mr. 18 Deshner and that's why she was 19 restrained, is that accurate? You were 20 explaining how the table was set? 21 A Yeah, how the table was set up. 22 Now, this part from here to there, I'm 23 not exactly sure what happened, but I 24 can tell you that I did have --- 25 holding her, we were moving out of the</p>	<p>Page 78</p> <p>1 Across from Claudette. Next to 2 me, which was to the right of George 3 Deshner, would have been John Higgins. 4 To the left of George, to the right of 5 Joann, would have been Charlie Heller, 6 if I remember. 7 BY ATTORNEY NICHOLS: 8 Q All right. Let me just cut 9 right to the chase here, because this 10 particular incident --- did you at any 11 time during this meeting hear Ms. 12 deLeon direct profanity toward anybody 13 at the meeting? 14 A No. 15 Q All right. Did you see her, 16 observe her try to physically accost 17 anybody or physically strike anybody? 18 A No, she did not physically 19 strike anyone? 20 Q Now, you did testify that you 21 assisted her, escorted her from the 22 room because she was visibly upset, is 23 that correct? 24 A I --- 25 Q You and Ms. Willison, I believe;</p>

1 to and even after the addition on the
2 building, space was an issue, concern,
3 relative to the teachers' classrooms,
4 that unless there was retired teachers,
5 there was an issue concerning space; is
6 that accurate?
7 A Yes. There were not enough
8 rooms for all the teachers.
9 Q Not just Ms. deLeon?
10 A Correct.
11 ATTORNEY HEATH:
12 That's all I have.
13 ATTORNEY NICHOLS:
14 Okay. That's all.
15 ATTORNEY NICHOLS:
16 Thank you.
17 *****
18 *****
19 DEPOSITION CONCLUDED AT 3:52 P.M.
20 *****
21
22
23
24
25

• PHILADELPHIA, PA
• SOMERSET, PA
• WILKES BARRE, PA
• CHAMBERSBURG, PA

• INDIANA, PA
• GREENSBURG, PA

SARGENT'S
COURT REPORTING
SERVICE, INC.

• ERIE, PA
• OIL CITY, PA
• PITTSBURGH, PA

• CLEARFIELD, PA
• STATE COLLEGE, PA
• HOLLIDAYSBURG, PA

WENDY S. BLAIR
Commissioner of Deeds
Commonwealth of Pennsylvania
My Commission Expires June 5, 2006

Wendy Blair, Reporter

I, Wendy Blair, a Commissioner of Deeds in
and for the Commonwealth of Pennsylvania, do
hereby certify:
That the witness whose testimony appears in
the foregoing deposition, was duly sworn by me on
said date and that the transcribed deposition of
said witness is a true record of the testimony
given by said witness;
That the proceeding is herein recorded fully
and accurately;
That I am neither attorney nor counsel for,
nor related to any of the parties to the action in
which these depositions were taken, and further
that I am not a relative of any attorney or
counsel employed by the parties hereto, or
financially interested in this action.

C E R T I F I C A T E

COMMONWEALTH OF PENNSYLVANIA)
COMMISSIONER OF DEEDS)

25
24
23
22
21
20
19
18
17
16
15
14
13
12
11
10
9
8
7
6
5
4
3
2
1